

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

STATE OF MISSOURI ex rel. ERIC S.
SCHMITT, Attorney General, and

STATE OF LOUISIANA ex rel. JEFFREY
M. LANDRY, Attorney General,

Plaintiffs,

v.

JOSEPH R. BIDEN, JR., in his official
capacity as President of the United States, *et*
al.,

Defendants.

Case No. 3:22-cv-01213

**PLAINTIFFS' MOTION FOR LEAVE TO EXCEED THE PAGE LIMIT FOR THEIR
MEMORANDUM IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION**

Plaintiffs, the States of Missouri and Louisiana, by and through their Attorneys General, Eric S. Schmitt and Jeffrey M. Landry (collectively, "Plaintiffs" or "the States"), pursuant to Rule 7.8 of the Local Rules of the U.S. District Court for the Western District of Louisiana, respectfully request this Court's leave to file a Memorandum in Support of their Motion for Preliminary Injunction that exceeds the 25-page limit for briefs in the Local Rules. In support, Plaintiffs state as follows:

The Complaint in this case alleges that thirteen federal-official defendants have engaged in, and are engaging in, a far-reaching course of conduct designed to censor and suppress content, speakers, and viewpoints disfavored by Defendants on social-media platforms; and that they have both coerced, threatened, compelled, and finally colluded directly with social-media platforms to procure the censorship and suppression of speech and speakers they disfavor, all in violation of

the First Amendment and as *ultra vires*, unlawful activity. ECF 1. To vindicate the sovereign interests of the States and the fundamental rights of their citizens, the States seek a preliminary injunction from this Court in three phases, including (1) granting immediate injunctive relief against the most egregious violations of the First Amendment, (2) ordering preliminary-injunction-related discovery to uncover the full details and scope of the Defendants' social-media censorship activities, and (3) granting more specific and comprehensive injunctive relief after conclusion of that discovery. In support, the States have prepared a detailed memorandum supported by fourteen declarations and over 70 supporting exhibits. Due to the complexity and enormous importance of the issues raised in this case, the States respectfully submit that an overlength memorandum is warranted to provide the Court with a comprehensive explication of the relevant factual and legal issues. To this end, the States respectfully request leave to file a memorandum of approximately 58 pages, exclusive of cover page, tables of contents and authorities, and certificates, in support of their motion for preliminary injunction.

The States served all Defendants by certified mail on May 10, 2022. ECF 9. No counsel has yet appeared on behalf of any Defendant, so the States were unable to confer with counsel for Defendants about the relief requested in this motion.

CONCLUSION

For the reasons stated, Plaintiffs respectfully request the Court's leave to file a memorandum of approximately 58 pages in support of their motion for preliminary injunction.

Dated: June 14, 2022

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/s/ D. John Sauer

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Respectfully submitted,

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/s/ Elizabeth B. Murrill

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Counsel for State of Louisiana

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CERTIFICATE OF SERVICE

I hereby certify that, on June 14, 2022, I caused a true and correct copy of the foregoing to be filed by the Court's electronic filing system, to be served by operation of the Court's electronic filing system on counsel for all parties who have entered in the case. In addition, on June 14, 2022, I caused a true and correct copy of the foregoing to be sent by certified mail to all Defendants at the following addresses:

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The Honorable Joseph R. Biden, Jr.
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/s/ D. John Sauer